

1 PHILLIP A. TALBERT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U.S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5 Attorneys for the United States

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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY 10.19321397
BITCOIN,

15 Defendant.

2:21-CV-02353-JAM-DB

DECLARATION OF TAMMY TEGLIA IN
SUPPORT OF REQUEST TO CLERK FOR
ENTRY OF DEFAULT AGAINST CAROLINE
HEPWORTH

17

18 I, TAMMY TEGLIA, declare as follows:

19 1. I am the Paralegal Specialist assigned to the above-captioned civil forfeiture action.

20 2. I have personal knowledge of the following matters, except those stated on information
and belief, and as to those matters I believe them to be true, and if called as a witness in this proceeding,
22 after being duly sworn, I could and would competently testify thereto.

23 3. To the best of my knowledge and belief, Caroline Hepworth is not an infant nor is she an
incapacitated person.

25 4. To the best of my knowledge and belief, Caroline Hepworth is not in the military service
of the United States, within the meaning of the Servicemembers Civil Relief Act of 2003. (50 U.S.C.
27 App. §§ 501-596).

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1 5. On January 6, 2022, the United States mailed copies of the complaint, application and
2 order for publication, warrant for arrest, order requiring service of process and joint status report, order re
3 filing requirements, and court notices to Caroline Hepworth at 246 Schlaf Drive, Oroville, CA 95965, by
4 first class mail and certified mail number 7018 0360 0000 6580 0529. The PS Form 3811 (certified mail
5 "green card" showing delivery of mail) was signed by Caroline Hepworth on January 19, 2022. A true
6 and correct copy of the letters mailed to Caroline Hepworth and the certified mail receipt are attached as
7 Exhibit A.

8 6. On January 19, 2022, the U.S. Secret Service personally served the above-listed
9 documents on Caroline Hepworth at 246 Schlaf Drive, Oroville, CA 95965. A true and correct copy of
10 the Process Receipt and Return filed March 2, 2022, is attached as Exhibit B.

11 7. On or about January 25, 2022, Ms. Hepworth submitted a Consent of U.S. Magistrate
12 Judge Jurisdiction form to the Clerk's Office for filing (Doc. No. 7). On January 27, 2022, the U.S.
13 Secret Service case agent told me he spoke to Ms. Hepworth regarding the Consent of U.S. Magistrate
14 Judge Jurisdiction form she submitted to the Clerk's Office. The agent informed me that Ms. Hepworth
15 said she misunderstood what she was consenting to, did not want to file a claim in this case, and asked
16 how she could have the form rescinded. The agent said he told Ms. Hepworth she should contact the
17 Clerk's Office to see if the form could be withdrawn. Later that day, the agent told me that Ms.
18 Hepworth had called the Clerk's Office and was told they would make a note to disregard the paperwork
19 she sent them. The docket says "[DISREGARD – Filed in error]" for document number 7.

20 8. To date, no claim or answer has been filed by or on behalf of Caroline Hepworth, as
21 required by Rule G(5) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture
22 Actions, and her time to file a claim and answer has expired.

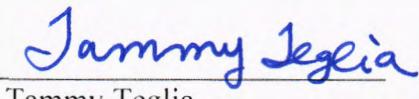
23 9. The defendant funds were arrested on March 7, 2022, by the U.S. Secret Service. See
24 Process Receipt and Return filed March 8, 2022.

25 10. Beginning on January 8, 2022, for at least thirty consecutive days, the United States
26 published Notice of the Forfeiture Action on the official internet government forfeiture site
27 www.forfeiture.gov. A Declaration of Publication was filed on March 2, 2022.

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1 I declare under penalty of perjury that the foregoing is true and correct.
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4 Executed this 15th day of March, 2022.
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10 Tammy Teglia
11 Paralegal Specialist
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EXHIBIT A



U.S. DEPARTMENT OF JUSTICE

*United States Attorney
Eastern District of California*

*Phillip A. Talbert
United States Attorney*

501 I Street, Suite 10-100 Phone 916/554-2700
Sacramento, CA 95814 Fax 916/554-2900
 TTD 916/554-2855

January 6, 2022

FIRST CLASS MAIL

NOTICE OF FORFEITURE ACTION

Caroline Hepworth
246 Schlauf Drive
Oroville, CA 95965

Re: Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

We are informing you of the filing of this Complaint because you may have the right to appear in this action and contest the forfeitability of the property. If you intend to contest forfeitability, a Claim, signed under penalty of perjury, must be filed with the Court no later than thirty-five (35) days after the date of this notice; and an Answer or a motion under Rule 12 of the Federal Rules of Civil Procedure ("Fed. R. Civ. P.") must be filed with the Court within twenty-one (21) days of the filing of your claim. Please contact the Clerk of the U.S. District Court at 916/930-4000 for specific inquiries concerning the procedure for the filing of your Claim and Answer. A copy of any document filed with the Court must be served on this office. If you have an adequate reason, you may be able to obtain a reasonable extension of time for the filing of either the Claim or Answer by contacting me at the number provided below.

The Claim as submitted will have to be in compliance with the provisions of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions in that it must identify the specific property being claimed, identify the claimant and state the claimant's interest in the property, and it must be signed under penalty of perjury by you.

If no Claim has been filed with the Court and served on this office within thirty-five (35) days of the date of this notice, we will assume that you do not intend to intervene and will take a default judgment against your interest in the defendant property at that time.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. *See* 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. *See* 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert
United States Attorney



TAMMY TEGLIA
Paralegal Specialist
Asset Forfeiture Unit

Enclosures



U.S. DEPARTMENT OF JUSTICE

*United States Attorney
Eastern District of California*

*Phillip A. Talbert
United States Attorney*

501 I Street, Suite 10-100
Sacramento, CA 95814

Phone 916/554-2700
Fax 916/554-2900
TTD 916/554-2855

January 6, 2022

CERTIFIED MAIL

NOTICE OF FORFEITURE ACTION

Caroline Hepworth
246 Schlaf Drive
Oroville, CA 95965

Re: Approximately 10.19321397 Bitcoin, 2:21-CV-02353-JAM-DB

Dear Potential Claimant(s):

This is to advise you that a Verified Complaint for Forfeiture *In Rem* has been filed against the above-described property. Enclosed are copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, and notice of availability of voluntary dispute resolution.

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The Claim as submitted will have to be in compliance with the provisions of Rule G(5)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions in that it must identify the specific property being claimed, identify the claimant and state the claimant's interest in the property, and it must be signed under penalty of perjury by you.

If no Claim has been filed with the Court and served on this office within thirty-five (35) days of the date of this notice, we will assume that you do not intend to intervene and will take a default judgment against your interest in the defendant property at that time.

The government may also consider granting petitions for remission or mitigation, which pardon all or part of the property from the forfeiture. A petition must include a description of your interest in the property supported by documentation; include any facts you believe justify the return of the property; and be signed under oath, subject to the penalty of perjury, or meet the requirements of an unsworn statement under penalty of perjury. See 28 U.S.C. Section 1746. For the regulations pertaining to remission or mitigation of the forfeiture, see 28 C.F.R. Sections 9.1 - 9.9. The criteria for remission of the forfeiture are found at 28 C.F.R. Section 9.5(a). The criteria for mitigation of the forfeiture are found at 28 C.F.R. Section 9.5(b). The petition need not be made in any particular form and may be filed online or in writing. You should file a petition not later than 11:59 p.m. EST thirty (30) days after the date of this notice. See 28 C.F.R. Section 9.3(a). The <https://www.forfeiture.gov/FilingPetition.htm> website provides access to a standard petition form that may be mailed and the link to file a petition online. If you cannot find the desired assets online, you must file your petition in writing by sending it to Assistant U.S. Attorney Kevin C. Khasigian, 501 I Street, Suite 10-100, Sacramento, CA 95814. This website provides answers to frequently asked questions (FAQs) about filing a petition. You may file both a verified claim with the court and a petition for remission or mitigation.

Please advise us prior to the filing deadline if you have any problems with the preparation and filing of a Claim, or with the time limitations. I can be reached at 916/554-2768.

Sincerely,

Phillip A. Talbert
United States Attorney



TAMMY TEGLIA
Paralegal Specialist
Asset Forfeiture Unit

Enclosures

U.S. POSTAL SERVICE
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com.

OFFICIAL USE

\$	6 5 8 0									
Certified Mail Fee										
\$										
Extra Services & Fees (check box, add fee as appropriate)										
<input type="checkbox"/> Return Receipt (hardcopy)		\$								
<input type="checkbox"/> Return Receipt (electronic)		\$								
<input type="checkbox"/> Certified Mail Restricted Delivery		\$								
<input type="checkbox"/> Adult Signature Required		\$								
<input type="checkbox"/> Adult Signature Restricted Delivery		\$								
Postage										
 Caroline Hepworth 246 Schlaf Drive Oroville, CA 95965										

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

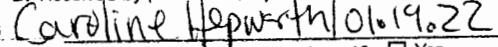
- Complete Items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

COMPLETE THIS SECTION ON DELIVERY

A. Signature


 Agent
 Addressee

B. Received by (Printed Name)

 Caroline Hepworth

C. Date of Delivery

06.19.22

Delivery address different from item 1? Yes'ES, enter delivery address below: No

Caroline Hepworth
246 Schlaf Drive
Oroville, CA 95965



9590 9402 5505 9249 5441 49

2. Article Number (Transfer from service label)

7018 0360 0000 6580 0529

- | | | |
|-----------------|--|--|
| 3. Service Type | <input type="checkbox"/> Priority Mail Express®
<input type="checkbox"/> Registered Mail™
<input type="checkbox"/> Registered Mail Restricted Delivery
<input checked="" type="checkbox"/> Certified Mail®
<input type="checkbox"/> Certified Mail Restricted Delivery
<input type="checkbox"/> Collect on Delivery
<input type="checkbox"/> Collect on Delivery Restricted Delivery
<input type="checkbox"/> Insured Mail
<input type="checkbox"/> Insured Mail Restricted Delivery
(over \$500) | <input type="checkbox"/> Return Receipt for Merchandise
<input type="checkbox"/> Signature Confirmation™
<input type="checkbox"/> Signature Confirmation Restricted Delivery |
|-----------------|--|--|

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

EXHIBIT B



Department of the Treasury
Federal Law Enforcement Agencies
PROCESS RECEIPT AND RETURN

PLAINTIFF United States of America		COURT CASE NUMBER 2:21-CV-02353-JAM-DB	
DEFENDANT Approximately 10.19321397 Bitcoin		TYPE OF PROCESS Service	
SERVE AT	NAME OF INDIVIDUAL, COMPANY, CORPORATION, ETC. TO SERVE OR DESCRIPTION OF PROPERTY TO SEIZE Caroline Hepworth		
	ADDRESS (Street or RFD, Apartment No., City, State and Zip Code) 246 Schlaf Drive, Oroville, CA 95965		
SEND NOTICE OF SERVICE COPY TO REQUESTER AT NAME AND ADDRESS BELOW U.S. Attorney's Office Attn: T. Teglia 501 I Street, Suite 10-100 Sacramento, CA 95814		NUMBER OF PROCESS TO BE SERVED IN THIS CASE	
		NUMBER OF PARTIES TO BE SERVED IN THIS CASE	
		CHECK BOX IF SERVICE IS ON USA	
<p>SPECIAL INSTRUCTIONS OR OTHER INFORMATION THAT WILL ASSIST IN EXPEDITING SERVICE (Includes Business and Alternate Addresses, Telephone Numbers, and Estimated Times Available For Service)</p> <p>Please personally serve Caroline Hepworth at the above address with copies of the complaint, application and order for publication, warrant for arrest, order requiring service of process and joint status report, order re filing requirements, notice of availability of a magistrate judge, notice of availability of voluntary dispute resolution, and notice of forfeiture action.</p>			
Signature of Attorney or other Originator requesting service on behalf of <i>Tammy Teglia</i>		<input checked="" type="checkbox"/> PLAINTIFF <input type="checkbox"/> DEFENDANT	TELEPHONE NO. Tammy (916) 554-2768
SIGNATURE AND DATE OF PERSON ACCEPTING PROCESS <i>Caron H. John</i>		DATE <i>01.19.2022</i>	
SPACE BELOW FOR USE OF TREASURY LAW ENFORCEMENT AGENCY			
I acknowledge receipt for the total number Of process indicated	District of Origin No.	District to Serve No.	SIGNATURE OF AUTHORIZED TREASURY AGENCY OFFICER
DATE			
<p>I HEREBY CERTIFY AND RETURN THAT I <input checked="" type="checkbox"/> PERSONALLY SERVED. <input type="checkbox"/> HAVE LEGAL EVIDENCE OF SERVICE. <input type="checkbox"/> HAVE EXECUTED AS SHOWN IN "REMARKS". THE PROCESS DESCRIBED ON THE INDIVIDUAL, COMPANY, CORPORATION ETC. AT THE ADDRESS SHOWN ABOVE OR ON THE ADDRESS INSERTED BELOW</p> <p><input type="checkbox"/> I HEREBY CERTIFY AND RETURN THAT I AM UNABLE TO LOCATE THE INDIVIDUAL, COMPANY, CORPORATION, ETC NAMED ABOVE.</p>			
NAME & TITLE OF INDIVIDUAL SERVED IF NOT SHOWN ABOVE:		<input type="checkbox"/> A person of suitable age and discretion then residing In the defendant's usual place of abode.	
ADDRESS: (Complete only if different than shown above)		DATE OF SERVICE <i>1-19-22</i>	TIME OF SERVICE <i>2:52</i>
		<input type="checkbox"/> AM <input checked="" type="checkbox"/> PM	
SIGNATURE, TITLE AND TREASURY AGENCY <i>Mark Rooy, Special Agent USSS</i>			
REMARKS:			

2:21-cv-02353-JAM-DB USA v. Approx. 10.19321397 Bitcoin

CIVIL

U.S. District Court

Eastern District of California - Live System

Notice of Electronic Filing

The following transaction was entered by Khasigian, Kevin on 3/2/2022 at 9:01 AM PST and filed on 3/2/2022

Case Name: USA v. Approx. 10.19321397 Bitcoin

Case Number: 2:21-cv-02353-JAM-DB

Filer: United States of America

Document Number: 8

Docket Text:

CERTIFICATE of SERVICE by United States of America re [5] Writ Issued, [4] Proposed Order, [1] Complaint, [3] Civil New Case Documents for JAM, [6] Order. (Khasigian, Kevin)

2:21-cv-02353-JAM-DB Notice has been electronically mailed to:

Kevin Christopher Khasigian , GOVT kevin.khasigian@usdoj.gov, caseview.ecf@usdoj.gov, kendra.ford@usdoj.gov, kimberly.bradley@usdoj.gov, tammy.teglia@usdoj.gov, usacae.ecfsaccv@usdoj.gov

2:21-cv-02353-JAM-DB Electronically filed documents must be served conventionally by the filer to:

The following document(s) are associated with this transaction:

Document description: Main Document

Original filename: n/a

Electronic document Stamp:

[STAMP_dcecfStamp_ID=1064943537 [Date=3/2/2022] [FileNumber=11726440-0
] [35a29bde578d8e238cbbd07c9bc21f81c19332230318616bc5fb2e7741ceba1f9f0
ff54c8454935e7aa79f8b370100df3d6d708baf058332587059e5913af30d]]